

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
SAN FRANCISCO BAY REGION

ORDER NO. 88-104  
SITE CLEANUP REQUIREMENTS AND RESCISSION OF  
ORDER NO. 86-3 FOR:

MCKESSON CORPORATION  
33950 SEVENTH STREET FACILITY  
UNION CITY  
ALAMEDA COUNTY

The Regional Water Quality Control Board, San Francisco Bay Region, (hereinafter called the Board), finds that:

1. McKesson Corporation, the waste discharger, operated a chemical packaging and distribution facility formerly known as McKesson Chemical Company, at 33950 Seventh Street, in Union City, California, from 1971 until November 1986.
2. The site occupies approximately 8 acres of land on the edge of a light industrial park. Inorganic and organic chemicals were handled at the facility, including caustics, chlorine and organic solvents. Prior to construction of the McKesson Chemical Company facility, agriculture was the principal land use.
3. Chlorinated hydrocarbons were first detected in the soil and ground water beneath the facility in the early 1980's. No major spills are known to have occurred during the operational history of the facility.
4. McKesson has been investigating hydrogeologic conditions, as well as the lateral and vertical extent of on-site soil and on-site and off-site ground water pollution. Water quality data indicates that the polluted ground water plume has migrated off-site. Water quality samples collected from both on-site and off-site monitoring wells have contained pollutant concentrations in the part per million range. Further investigations are necessary to define the full extent of the pollution to background levels.
5. The pollution is believed to be the result of poor housekeeping practices during operation of the facility. One likely source is spillage at the drum filling station for solvents. Several soil samples collected from this area have indicated concentrations of pollutants in the parts per hundred range. In 1987 and 1988, McKesson excavated the soil in this area, disposed of portions off-site, and remediated the remainder through an on-site aeration program.

6. McKesson is currently operating a pilot ground water extraction and treatment system in accordance with a plan accepted by the Board's staff.
7. Interim remedial measures have also included removal of all above and below ground tanks at the site.
8. McKesson has conducted an investigation regarding the identification and abandonment of wells which could act as potential conduits of pollution in accordance with a plan accepted by the Board's staff.
9. On February 19, 1986, the Regional Board adopted Order No. 86-3, Site Cleanup Requirements for the McKesson site. This Order specifies tasks and task completion deadlines for designated investigation/remediation activities. Historically, McKesson has appeared willing to cooperate and submit work as required, but has had difficulty submitting technical reports acceptable to the Board's staff in a timely manner.
10. In September, 1987, McKesson contracted with a new consulting firm in an attempt to generate a more effective and efficient pollution investigation. McKesson's output has been timely and technically acceptable to the Board's staff since engaging this new consultant. Recently completed investigatory work has included a soil gas survey to assess the near surface distribution of selected organic compounds to provide an indication of the extent of pollution migration, and installation of 21 additional on-site and off-site wells to delineate the horizontal and vertical extent of ground water pollution.
11. On November 13, 1987, McKesson submitted a revised workplan proposal for completion of the on-site and off-site pollution investigation and for development of remedial action alternatives. The workplan was approved by the Board's staff in a letter dated December 10, 1987. The workplan outlined a revised task completion schedule and therefore, the time schedule contained in Order No. 86-3 is no longer appropriate. The task completion deadlines specified in this revised Site Cleanup Requirements Order are consistent with the workplan's proposed task schedule.
12. The Board adopted a revised Basin Plan dated December, 1986 which prohibits the discharge of all deleterious substances, above those levels which can be achieved by a program acceptable to the Board, to the waters of the Basin.

13. The existing and/or potential beneficial uses of the ground water underlying and in the vicinity of the site include:
  - a. municipal supply
  - b. industrial process supply
  - c. industrial service supply
  - d. agricultural supply
14. The existing beneficial uses of the surface waters (Alameda Creek) include:
  - a. contact and noncontact water recreation
  - b. wildlife habitat
  - c. warm and cold fresh water habitat
  - d. fish migration and spawning
  - e. ground water recharge
  - f. agricultural supply
15. The Board has notified all interested agencies and persons of its intent to amend this Site Cleanup Requirements Order.
16. The Board, at a public meeting, heard and considered all comments pertaining to this Site Cleanup Requirements Order.
17. This permit is exempt from the provisions of the California Environmental Quality Control Act under Section 15304, Title 14, of the California Administrative Code.

IT IS HEREBY ORDERED, pursuant to Section 13304 of the California Water Code, that McKesson shall cleanup and abate the effects described in the above findings as follows:

A. PROHIBITIONS

1. The discharge of waste or hazardous material in a manner which will degrade water quality or adversely affect the beneficial uses of the waters of the State is prohibited.
2. Further significant migration of pollutants through subsurface transport to waters of the State is prohibited.

3. Activities associated with the subsurface investigation and cleanup, which will cause significant adverse migration of pollutants, are prohibited.

4. Bypassing extracted ground water from the treatment system to waters of the State is prohibited. If bypassing should occur, McKesson shall notify this Board's Executive Officer as soon as possible.

#### B. SPECIFICATIONS

1. McKesson shall conduct those investigatory activities needed for adequate characterization of the local hydrogeology and for full definition of the lateral and vertical extent of all soil and ground water pollution emanating from the site. Should monitoring results show evidence of pollutant migration, additional characterization of pollutant extent may be required.

2. The storage, handling, treatment or disposal of soil or ground water containing pollutants shall not create a nuisance as defined in Section 13050(m) of the California Water Code.

3. Any additional wells identified as potential conduits for the migration of pollution shall be properly sealed or abandoned, to the extent legally possible.

#### C. PROVISIONS

1. McKesson shall submit to the Board acceptable monitoring program reports containing results of work performed according to a program acceptable to the Board's Executive Officer.

2. McKesson shall comply with Prohibitions A.1, A.2, A.3 and A.4, and Specifications B.1, B.2 and B.3 above, in accordance with the following time schedule and tasks:

##### a. COMPLETION DATE: August 15, 1988

TASK: Determine the hydraulic characteristics of major water bearing zones found to have pollution, and evaluate any vertical hydraulic continuity between aquifers and the potential for vertical migration of pollutants between water bearing zones. The results of these investigations shall be included in the Monthly Report due August, 1988.

b. COMPLETION DATE: May 15, 1989

TASK: Submit a technical report acceptable to the Board's Executive Officer which documents full definition of the horizontal and vertical extent of on-site soil and ground water pollution and off-site ground water pollution emanating from the site in the area upgradient of the Alameda County Zone 5 Line M flood control channel. For the area downgradient of the flood control channel, the technical report shall document full definition of the horizontal and vertical extent of the off-site ground water pollution emanating from the site or merger of that ground water pollution with ground water pollution emanating from the Pacific States Steel site. If full definition or merger cannot be documented because sufficient data are not available from the Pacific States Steel site ground water pollution investigation being implemented by Pacific States Steel pursuant to requirements established by the California Department of Health Services, the completion date for this provision shall be reviewed in accordance with Provision 13.

c. COMPLETION DATE: July 15, 1989

TASK: Submit a technical report acceptable to the Board's Executive Officer containing the results of the remedial investigation, a feasibility study which evaluates alternative remedial strategies and technologies, selection and detailed design of final remedial measures for hydraulic control, containment and cleanup of the pollutant plumes on-site and off-site, and a proposal describing how the discharger will determine/demonstrate cleanup. A projection of cost, anticipated system effectiveness, benefits, and impacts on public health, welfare and the environment shall be included for each remedial alternative. The remedial investigation and feasibility study shall consider the guidance provided by Subpart F of the National Oil and Hazardous Substances Pollution Contingency Plan (40 CFR Part 300), Section 25356.1 (c) of the California Health and Safety Code, CERCLA guidance documents and the State Water Resources Control Board's Resolution No. 68-16, "Statement of Policy with Respect to Maintaining High Quality of Waters in California". The report shall include a schedule for implementation of the approved final remedial measures. If full plume definition or plume merger cannot be documented as provided in Provision C.2.b, the completion date for this provision shall be reviewed in accordance with Provision 13.

d. COMPLETION DATE: November 15, 1989

TASK: Beginning November 15, 1989, McKesson shall submit the first report of a series of annual technical reports, acceptable to the Board's Executive Officer, which documents progress achieved towards cleanup and anticipated actions to be performed the following year. This report should include, but not be limited to, a summary of construction/installation activities, an assessment of system testing operations, and documentation that the system's operation is consistent with design performance specifications. This report may be submitted as an attachment to the November monthly summary report.

3. If McKesson is delayed, interrupted or prevented from meeting one or more of the completion dates specified in this Order, the discharger shall promptly notify the Executive Officer and the Board may consider revision to this Order.

4. McKesson shall continue to submit monthly summaries of its progress toward compliance with the Prohibitions, Specifications, and Provisions of this Order. Monthly summaries should be received in written form by the Board's Executive Officer by the end of the second week of each month. These reports shall consist of a letter report that, (1) summarizes work completed since submittal of the previous report, and work projected to be completed by the time of the next report, (2) identifies any obstacles which may threaten compliance with the schedule of this Order and what actions are being taken to overcome these obstacles, and (3) includes, in the event of non-compliance with Provision C.2. or any other Specification or Provision of this Order, written notification which clarifies the reasons for non-compliance and which proposes specific measures and a schedule to achieve compliance. This written notification shall identify work not completed that was projected for completion, and shall identify the impact of non-compliance on achieving compliance with the remaining requirements of this Order.

McKesson shall include the results of quarterly water quality sampling of on-site and off-site wells with the August, November, February and May monthly summary reports.

5. All hydrogeological plans, specifications, reports, and documents shall be signed by or stamped with the seal of a registered geologist, engineering geologist or professional engineer.

6. All samples shall be analyzed by State certified laboratories or laboratories accepted by the Board using approved EPA methods for the type of analysis to be performed. All laboratories should maintain quality assurance/quality control records for Board review.

7. McKesson shall maintain in good working order, and operate, as efficiently as possible, any facility or control system installed to achieve compliance with the requirements of this Order.

8. Copies of all correspondence, reports, and documents pertaining to compliance with the Prohibitions, Specifications, and Provisions of this Order, shall be provided to the following agencies:

- a. Alameda County Water District
- b. Alameda County Health Department
- c. Union City Fire Department
- d. State Department of Health Services/TSCD
- e. State Water Resources Control Board

The Board's Executive Officer may additionally require copies of correspondence, reports and documents pertaining to compliance with the Prohibitions, Specifications, and Provisions of this Order to be provided to the U.S. Environmental Protection Agency, Region IX, and to a local repository for public use.

9. McKesson shall permit the Board or its authorized representative, in accordance with Section 13267(c) of the California Water Code:

a. Entry upon McKesson's premises in which any pollution sources exist, or may potentially exist, or in which any required records are kept, which are relevant to this Order.

b. Access to copy any records required to be kept under the terms and conditions of this Order.

c. Inspection of any monitoring equipment or methodology implemented in response to this Order.

d. Sampling of any ground water or soil which is accessible, or may become accessible, as part of any investigation or remedial action program undertaken by the discharger.

10. McKesson shall file a report on any changes in site occupancy and ownership associated with the facility described in this Order.

11. Board Order 86-3 is no longer applicable and is hereby rescinded.

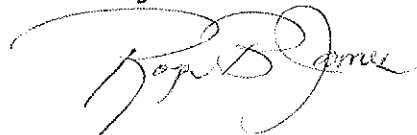
12. If any hazardous substance, as defined in Section 13050(p) of the California Water Code, is discharged in or on any waters of the state, or discharged and deposited where it is, or probably will be discharged in or on any waters of the state, McKesson shall report such discharge to this Regional Board, at (415) 464-1255 on weekdays during office hours from 8 a.m. to 5 p.m., and to the Office of Emergency Services at (800) 852-7550

during non-business hours. A written report shall be filed with the Regional Board within five (5) working days and shall contain information relative to: the nature of waste or pollutant, quantity involved, duration of incident, cause of spill, Spill Prevention, Control, and Countermeasure Plan (SPCC) in effect (if any), estimated size of affected area, nature of effects, corrective measures that have been taken or planned and a schedule of these remedial activities, and persons/agencies notified.

13. The Board will review this Order periodically and may revise the requirements when necessary.

I, Roger B. James, Executive Officer, do hereby certify that the foregoing is a full, true and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on June 15, 1988.

Roger B. James

A handwritten signature in cursive script, appearing to read "Roger B. James", written in dark ink.

Executive Officer